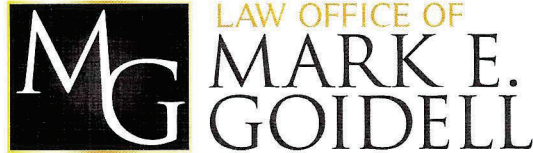


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March 12, 2022

Via ECF

Hon. Valerie Caproni, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square, Room 240
New York, New York 10007

Re: *Heinrich v. Dean, et al.*
Case No. 1:21-cv-10657

MEMO ENDORSED

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 3/14/2022

Dear Judge Caproni,

This letter is submitted by Defendants Malayene Dean and Charles Yassim (collectively, "Moving Defendants") to request, on Plaintiffs' consent, that the Court enter a protective order pursuant to Fed. R. Civ. P. 26(c) to stay discovery pending the determination of the Moving Defendants' motion to dismiss. As a result, it is respectfully requested that the Court issue a new Case Management Plan reflecting the stay.

Thank you once again for your assistance in this matter.

Very truly yours,

s/ Mark E. Goidell

Mark E. Goidell

cc: All counsel (via ECF)

Application GRANTED in part. Discovery as to Defendants Dean and Yassim is STAYED pending resolution of these Defendants' motion to dismiss. The Court does not need to enter a new Case Management Plan to reflect this change.

SO ORDERED.

A handwritten signature in blue ink, appearing to read 'Valerie Caproni'.

3/14/2022

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE